

PROPOSAL EVALUATION

Integrated Regional Water Management Implementation Proposition 50, Chapter 8 IRWM Implementation Step 1

PIN: 6564
APPLICANT NAME: Lake County Special Districts
PROJECT TITLE: Full Circle

FUNDS REQUESTED: \$1,599,849
COST MATCH: \$ 0
TOTAL PROJECT COST: \$1,599,849

DESCRIPTION:

Question: Consistency with Minimum IRWM Standards - This evaluation will focus on whether the applicant has demonstrated that the IRWM Plan meets the minimum standards.

Fail

Question: Consistency with IRWM Standards - Adopted IRWM Plan and Proof of Formal Adoption. Weighting factor is 1.

The proposed IRWMP does not meet the minimum planning requirements to qualify under Step 1. The draft IRWMP is an early draft with very minimal documentation to give the assurance that the IRWMP will be adopted by cooperating agencies in a timely manner. An outline and brief description of what each section will cover is in the application. Coordination or consolidation with proposal #5316 Lake County Watershed Protection District may be needed.

Question: Consistency with IRWM Standards - Description of Region. Weighting factor is 1.

More detail description of the region would make for a stronger IRWMP. A map in the DWSP showed little information other than drainages and watersheds in the region. The relevance of the map is not evident and is very general. The mapping does not include appropriate internal boundaries to the region, major water related infrastructure, and major land-use divisions within the region. Limited discussion on the current quantity and quality of water resources within the region, detail quantitative or qualitative discussion, is absent. No discussion of the water supplies and demand for a minimum 20-year planning horizon or aquatic ecological processes and environmental resources within the regional boundaries is included. Discussion of the regional socio-economic conditions and important trends is minimal. There is another proposal in the same county and reason for not integrating it should be discussed.

Question: Consistency with IRWM Standards - Objectives. Weighting factor is 1.

Several regional objectives are identified; however, no discussion was included in the application on how they were developed. The applicant states that they are in the process of developing an IRWMP that will be comprehensive and provide several integrated benefits. A discussion on whether the IRWMP will address major water objectives and conflicts in the region is not included.

Question: Consistency with IRWM Standards - Water Management Strategies and Integration. Weighting factor is 1.

The applicant lists several water management strategies to be considered, but does not discuss the applicability of providing reliable water supply, protecting or improving water quality, and achieving other objectives identified. A discussion of how the water management strategies would be integrated or would work together would be helpful. The added benefit of integration of multiple water management strategies is weak, and no information is provided on why other strategies were ruled out. Integration and coordination with proposal #5316 Lake County Watershed Protection District was not apparent.

Question: Consistency with IRWM Standards - Priorities and Schedule. Weighting factor is 1.

Regional priorities are identified, but the relationship between short-term and long-term priorities and any future modification to these priorities is absent. Short-term priorities are defined in the proposal, but details are lacking. No discussion is included on how the IRWMP decision making is responsive to regional changes, how implementation of projects will be assessed, or how project sequencing may be altered based on implementation responses. The applicant discusses several 25-year goals and some steps to achieve those. No detailed steps or timeline is given.

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Question: Consistency with IRWM Standards - Implementation. Weighting factor is 1.

The proposal identifies the implementation of the recycled water project as the primary priority, but does not discuss the implementation of the IRWMP. Only one project was identified and the IRWMP does not have specific actions or studies by which the IRWMP will be implemented. The application does not indicate how the implementation of the proposed project will contribute to the overall planning. Economic and technical feasibility of the project is not demonstrated on a programmatic level. No institutional structure is identified that would ensure plan implementation.

Question: Consistency with IRWM Standards - Impacts and Regional Benefits. Weighting factor is 1.

No evaluation of potential negative impacts from IRWMP implementation within the region or in adjacent areas is provided. Analysis of advantages of regional planning versus individual local effort is not provided. Although waiver for DAC was sought, the applicant does not identify the DAC composition, identify direct benefits to the DAC, or provide any supporting documentation to substantiate the claim.

Question: Consistency with IRWM Standards - Technical Analysis and Plan Performance. Weighting factor is 1.

No discussion of data, technical methods, and analysis used in the selection of water management strategies is provided. No analysis is included in the application to determine if data gaps exist and how address the shortcomings. The IRWMP does not identify measures that will be used to evaluate plan/project performance, monitoring systems that will be used to gather performance data, and mechanism to adapt project operation and plan implementation based on performance data collected.

Question: Consistency with IRWM Standards - Data Management. Weighting factor is 1.

The IRWMP does not include mechanisms by which data will be managed and disseminated to stakeholders and the public. There is no indication on how data collection will support statewide data needs. The applicant does not describe the current state of monitoring efforts, both for water supply and water quality. Data integration with regards to the SWAMP and GAMA is not addressed. However, a number of the planned projects could contribute statewide data needs as a result of their implementation.

Question: Consistency with IRWM Standards - Financing. Weighting factor is 1.

The applicant plans to fund the development of the IRWMP and its implementation through ratepayer revenues and federal and State assistance. Details on the financing programs, especially with regards to capital expenditures and O&M expenses are not provided.

Question: Consistency with IRWM Standards - Relation to Local Planning & Sustainability. Weighting factor is 1.

The connection between other plans, specifically the Lake County General Plan, the Clear Lake Management Plan, related the programs and projects of the two water agencies within the county, and the IRWMP are tersely discussed. No discussion is provided on how the identified project and related study will relate to the IRWMP and other local planning documents. The IRWMP does not demonstrate coordination with local land-use planning decision-makers, how its water management strategies relates to local planning, or the dynamics between the two levels of planning document.

Question: Consistency with IRWM Standards - Stakeholder Involvement & Coordination. Weighting factor is 1.

Except for a general reference to the desire for stakeholder involvement, details on how stakeholders are to be identified and a process for inclusion of stakeholders in the development and implementation of the plan is absent. A mechanism or process developed for public outreach, stakeholder involvement, and communication during plan implementation is not provided. There is no discussion of the various levels of involvement, from local to State to federal agencies, or their varying contributions. Environmental justice concerns are not addressed.

Question: Funding Match. This evaluation will focus on whether the applicant has demonstrated the ability to meet the minimum funding match or has requested a waiver or reduction in the funding match.

Question: Description of Proposal. Weighting factor is 3.

The description of the proposal, which consists of one project, is limited and general in nature. No discussion is provided on how the project will be consistent with and related to the IRWMP and achieve the stated objectives. The application lacks any substantial technical analysis, scientific basis, or scope of work. The applicant states that they need to upgrade the existing wastewater treatment plant and it is a high-priority. However, supporting documentation for the water quality and quantity issues addressed or improvements achieved by the implementation of this project is absent.

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Question: Project Prioritization. Weighting factor is 2.

The application does not outline the steps to implement the project or develop a relationship between the project and the IRWMP. However, the project was clearly stated as a regional priority in the IRWMP because project is the identified as the highest priority work within the wastewater element of the IRWMP. However, supporting rational is absent.

Question: Cost Estimate. Weighting factor is 1.

No supporting documentation is provided in the proposal to evaluate the reasonableness of the cost estimate. The information provided in the cost estimate is for construction and implementation only. No cost estimates associated with land, planning, design, or funding match is provided are provided. It is likely that some of these issues were addressed in previous phases of the project (design and CEQA). Other expenditures, such as permitting, bidding, administrative, and contingencies that are associated with construction should have been itemized.

Question: Schedule. Weighting factor is 1.

No supporting documentation is provided in the proposal to evaluate the reasonableness of the schedule. Construction is estimated to take four months for the construction of 6,000 lineal feet of piping, with design and CEQA shown as already completed, which appears to be too short for the amount of work and complexities involved.

Question: Need. Weighting factor is 2.

The applicant states that the wastewater treatment plant is old and uses an outdated process and is a high-priority candidate for facility upgrading. There is no discussion of the effluent quality. If the effluent is of low quality, it cannot be reused. Therefore, it is possible that without the treatment plant being upgraded that construction of the pipeline would not achieve the stated goal - provision of a new water supply for the agricultural sector. The applicant also fails to mention if they have interest from potential users of the reused water. Local and regional economic, environmental, and fiscal impacts are not discussed. Analysis of the positive or negative impacts resulting from either from completing or not completing the project is needed.

Question: Disadvantaged Communities. Weighting factor is 2.

The applicant requests a funding match waiver in consideration of the DAC status of Kelseyville MHI of \$24,363. However, they do not provide supporting documentation or identify the expected direct benefits of the proposal to the DAC. Quantitative analysis of the DAC population to the regional demographics is also not provided.

Question: Program Preferences. Weighting factor is 1.

The applicant does not describe how any of the program preferences would be met by the proposed project.

TOTAL SCORE: DISQUALIFIED
